

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

United States District Court
Southern District of Texas
FILED

CRIMINAL COMPLAINT

V.

Maria Guadalupe TORRES

JUL 24 2015

Case Number: M-15- -M

A87 256 440

YOB: 1982

COC: Mexico

Name and Address of Defendant

Clerk of Court

I the undersigned complainant, state the following is true and correct to the best of my knowledge and belief. On or about July 23, 2015 in Hidalgo County, in the Southern District of Texas defendant(s) did,

knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, transports, or moves or attempts to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law and brought the alien for the purpose of commercial advantage or private gain,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) & 1324(a)(2)(B)(ii)
I further state that I am a(n) Customs and Border Protection Officer and that this complaint is based on the following facts:

See Attachment A

Continued on the attached sheet and made a part of this complaint:

☒ Yes

☐ No

Sworn to before me and subscribed in my presence,

Approved to file
Jorge L. Lamm
Approved By: **D. Lindenmuth**

July 24, 2015

Date

Dorina Ramos

U.S. Magistrate Judge

Name and Title of Judicial Officer

at

[Signature]
Signature of Complainant

Juan R. Cienega

Printed Name of Complainant

McAllen, Texas

City and State

[Signature]
Signature of Judicial Officer

Attachment A

On July 23, 2015, the defendant, a resident alien of the United States and driver of the vehicle, attempted to bring illegally into the United States through the Pharr Port of Entry two undocumented siblings, L.D.R.M. (male, 11 years old) and E.R.M. (male, 13 years old), both Mexican citizens, as United States citizens. At primary, the defendant claimed the children as her own, that they were United States citizens, and presented:

- an Edinburg, Texas birth certificate bearing the name C.A.T. for L.D.R.M. and
- a City of McAllen, Texas birth certificate bearing the name F.J.T. Jr. for E.R.M.

The defendant's three other children were also in the vehicle. The primary inspection resulted in one child unable to answer basic questions and to the defendant admitting to bringing in the children illegally.

In secondary, the defendant admitted to having traveled to the bus station in Reynosa, Tamaulipas, Mexico and meeting with the children's mother, Maria Gabriela MANCERA-Cardenas. From there, she took custody of the children, drove to her mother's home, and proceeded to make entry into the United States through the Pharr Port of Entry. She went on to admit to utilizing her sons' birth certificates to bring the children into the United States illegally, and to knowing the children did not possess any legal documentation to enter the United States. Furthermore, she admitted to having contacted the children's father and providing him with her sons' birth certificates and school information in preparation for the smuggling attempt. The defendant claimed all arrangements were made by her husband, Francisco Torres. For her services, they (the defendant and her husband) were going to receive \$3,000.00 dollars.

The children's mother, MANCERA-Cardenas, was contacted and arrived at the Pharr Port of Entry. She claimed all arrangements had been made by the defendant's husband and her ex-husband. Furthermore, once the children arrived in San Antonio, Texas (with the children's father), the defendant was going to receive \$3,000.00 dollars. All database queries proved negative results on MANCERA-Cardenas and the children. The children were returned to Mexico in the company of their mother.

The defendant's three other children, all found to be United States citizens, were turned over to the defendant's brother.